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**Via ECF**

June 26, 2025

Honorable André M. Espinosa, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *Student Doe #1, et al. v. Noem, et al.*, No. 25-cv-2998 (KSH) (AME)**

Dear Judge Espinosa,

We represent Plaintiffs in the above-captioned matter and respectfully write on behalf of the Parties concerning a proposed schedule for the limited, expedited discovery allowed by the Court. *See* ECF No. 53. The Parties propose the following schedule:

- The Government will provide the Administrative Record for each Plaintiff within 21 days, on or before July 17, 2025; and
- The Government will complete production of responses to the limited, expedited discovery by August 7, 2025, and produce documents on a rolling basis.

We appreciate the Court's consideration of this schedule and are prepared to make adjustments if the Court requires.

Respectfully submitted,

/s/Jeanne LoCicero

**American Civil Liberties Union  
of New Jersey Foundation**

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cc: All Counsel of Record (via ECF)